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**Exhibit “F”**

MICHAEL WOODY  
MICROBILT vs BAIL INTEGRITY SOLUTIONS

July 29, 2020

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UNITED STATES DISTRICT COURT  
for the  
District of New Jersey

MICROBILT CORPORATION :  
 :  
Plaintiff, :  
 :  
v. : Civil Action No:  
 : 3:19-cv-00637  
BAIL INTEGRITY :  
SOLUTIONS, INC., et al, :  
 :  
Defendants. :  
 :

REMOTE DEPOSITION OF  
MICHAEL WOODY

Wednesday, July 29, 2020

9:31 a.m.

Asheville, North Carolina

Terry L. Bradley, Court Reporter

MICHAEL WOODY  
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1 Q. Do you know what the purchase price  
2 was?

3 A. I do not.

4 Q. And what happened after it was  
5 purchased?

6 A. I went to work for Bail Integrity.  
7 I was their Operations Director.

8 Q. And what were your duties and  
9 responsibilities as Operations Director?

10 A. Well, initially I started out  
11 running the bail side of the industry, making  
12 sure that the bail reports were executed  
13 properly, all the administrative things were  
14 done, and the recovery aspect was completed.

15 We picked up a runoff contract,  
16 which was a surety that went out of business,  
17 and I was head over that until it closed.

18 Q. And what do you mean by a "surety"?  
19 What does a surety do?

20 A. A surety is an insurance company  
21 that backs a bail bondsman. The fiduciary  
22 behind the bail bondsman.

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1 A. Uh, August or September of 2018.

2 Q. Let me backtrack for a second back  
3 to Bail Integrity. Did Bail Integrity have a  
4 relationship with Bail Bond Technologies?

5 A. They did.

6 Q. What kind of relationship?

7 A. Bail Bond Technologies was a data  
8 entry software program that Bail Integrity was  
9 going to try to go from Captira to. Was going  
10 to try to merge.

11 Q. Would Bail Bond Technologies ever  
12 tell Bail Integrity who they wanted you to  
13 contract with?

14 A. Not to my knowledge.

15 Q. So for example, when Bail Integrity  
16 entered an agreement with MicroBilt, was that  
17 pursuant to any kind of order or request by  
18 Bail Bond Technologies?

19 MR. HILLIARD: Objection to the  
20 form.

21 MR. JACOBVITZ: You may answer,  
22 sir.

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1 Q. What do you mean by "skip tracing"?

2 A. To try to locate a defendant.

3 Q. Anything else?

4 A. That's all that I knew of. That's  
5 all I knew MicroBilt was, was a skip tracing  
6 program.

7 Q. And how did they locate a defendant  
8 through skip tracing?

9 A. If they get a new utility or a new  
10 convenience in their name, MicroBilt picks up  
11 on it, just like TLO and Clear.

12 MR. JACOBVITZ: Lindsey, if we can  
13 turn to Exhibit 1, please. Letter of Intent.

14

15 (Exhibit 1 marked for  
16 identification.)

17 MR. HILLIARD: Jeff, are these new  
18 markings for this deposition? Or are you using  
19 the same exhibit numbers from the last  
20 deposition?

21 MR. JACOBVITZ: I think it's new  
22 markings.

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1 MR. HILLIARD: It is?

2 MR. JACOBVITZ: Yes.

3 BY MR. JACOBVITZ:

4 Q. Mr. Woody, I show you what's been  
5 designated Exhibit 1. It's a Letter of Intent  
6 with MicroBilt. Do you recognize this  
7 document?

8 A. Vaguely, I do.

9 Q. Do you know who filled it out?

10 A. I don't.

11 Q. Is that your handwriting?

12 A. The "Please explain in detail" could  
13 possibly be my handwriting, yes. Yes, that is  
14 my handwriting.

15 MR. JACOBVITZ: Okay. And if we  
16 could move down, Lindsey.

17 BY MR. JACOBVITZ:

18 Q. Sir, do you see Mr. Shirah's  
19 signature there?

20 A. I do.

21 Q. Do you recognize his signature?

22 A. I do.

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1 Q. Is that his signature?

2 A. I haven't seen his signature in a  
3 couple years. It looks like his signature,  
4 yes. I can't be 100 percent.

5 Q. Did you sign that for him? Or did  
6 anyone else to your knowledge sign it for him?

7 A. I did not sign that for him, but I  
8 don't know if anyone else did.

9 Q. Are you aware of whether Mr. Shirah  
10 was aware that this Letter of Intent had been  
11 signed for him or it was his signature?

12 MR. HILLIARD: Objection to form.

13 THE WITNESS: I don't know.

14 BY MR. JACOBVITZ:

15 Q. Did you ever discuss this document  
16 with Mr. Shirah?

17 A. I don't recall.

18 Q. That's not his electric signature,  
19 his DocuSign signature, is it?

20 MR. HILLIARD: Objection to form.

21 THE WITNESS: No, that's not a  
22 DocuSign.

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1 BY MR. JACOBVITZ:

2 Q. Did you discuss this document with  
3 Mr. Shirah at all?

4 A. I don't recall.

5 Q. Did you send this document to  
6 MicroBilt after it was signed?

7 A. I don't recall if I sent it or not.

8 Q. Does this document accurately state  
9 the purposes for which Bail Integrity intended  
10 to use MicroBilt services?

11 A. Yes. To verify someone has  
12 utilities or something in their name.

13 MR. JACOBVITZ: Okay. Lindsey, if  
14 you can move it up a little bit.

15 BY MR. JACOBVITZ:

16 Q. Could you read your handwriting  
17 there under bail bond services.

18 A. "Used to determine that clients  
19 under bail or considered for bail -- "

20 Q. If you could slow down.

21 A. "Used to determine that clients  
22 under bail or considered for bail are not using



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1 told you about him selling pings. Did you note  
2 for the record who that person was?

3 A. I have no idea. I just heard it  
4 through the grapevine, through the bail bond  
5 grapevine. Kind of like a hair salon,  
6 everybody gossips.

7 Q. Is it a big grapevine?

8 A. Yeah.

9 Q. Did you hear it through the  
10 grapevine anything about the article?

11 A. No.

12 Q. So getting back to leaving Bail  
13 Integrity, would you call it a friendly split?

14 A. No.

15 Q. And why was it unfriendly.

16 A. Uh, he didn't like the fact I left  
17 and was going to start my own business.

18 Q. "He" being Brian Shirah?

19 A. Correct.

20 Q. Did he tell you he didn't like the  
21 fact that you left?

22 A. Yeah.

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1 Q. What did he tell you?

2 A. He's just displeased that I left.

3 Q. Did he indicate why he was  
4 displeased?

5 A. No. Because I was going to become  
6 his competition.

7 Q. So he was looking at it as a  
8 business loss?

9 A. Yes.

10 MR. HILLIARD: Objection to the  
11 form.

12 BY MR. JACOBVITZ:

13 Q. And is that your current  
14 relationship with Bail Integrity? Is that a  
15 competitive relationship?

16 Would you consider --

17 Well, strike that.

18 Would you consider your relationship  
19 with Bail Integrity currently to be a business  
20 relationship?

21 A. No.

22 Q. And it's a competitive relationship?

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1 Q. Can you testify under oath today if  
2 anyone else had access to that other than Mr.  
3 Shirah and possibly Mr. Norvell?

4 A. I can't.

5 Q. And Is that because you were not  
6 involved in setting up the logins for that  
7 Mobile Device Verification program?

8 A. I was not involved.

9 Q. You then later testified that you  
10 thought it might be possible that Mr. Alvarez  
11 had access, correct?

12 A. Yes.

13 Q. But you don't --

14 Are you certain? Do you know one  
15 way or the other?

16 A. No, sir.

17 MR. JACOBOVITZ: Objection. Form.

18 BY MR. HILLIARD:

19 Q. Bear with me. I apologize. I just  
20 want to make this as efficient as possible.

21 A. Yes, sir.

22 Q. Mr. Jacobovitz asked you some things

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1 about that VICE Motherboard article that was  
2 published. Do you recall that?

3 A. Yes.

4 Q. And I wrote this down, your  
5 testimony. He asked you something to the  
6 effect of: Do you know why someone would sell  
7 a ping?

8 And again, I don't want to put words  
9 in your mouth. I'm just trying the refresh  
10 your recollection so I can ask you a couple  
11 questions about it.

12 And I believe your testimony was  
13 something to the effect of: You would have to  
14 be a dummy to do this.

15 A. That's correct.

16 Q. Do you recall that?

17 A. Yes.

18 Q. Can you elaborate on that? What did  
19 you mean by that?

20 MR. JACOBOVITZ: I object to the  
21 form. That wasn't the nature of my question.

22 But go ahead.

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1 BY MR. HILLIARD:

2 Q. Whatever, do you remember saying:

3 You'd have to be a dummy to do this?

4 A. Yes.

5 Q. What were you intending to say?

6 What did you mean by that?

7 A. That why would you do this outside  
8 your company? That's what I mean. Why would  
9 you do this to something outside your company?

10 Q. Do what?

11 A. Ping a phone. Sell a ping. Do  
12 business with somebody outside your company.

13 Q. Okay. And am I correct, sir, that  
14 you have no reason to believe or have any facts  
15 as you're sitting here today you could tell us,  
16 that Mr. Shirah had anything to do with selling  
17 a ping to a reporter or a contact outside of  
18 his company, correct?

19 A. That was --

20 MR. JACOBVITZ: Objection. Form.

21 MR. HILLIARD: What was your answer?

22 THE WITNESS: That was after I left.

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1 I have no idea.

2 MR. HILLIARD: Okay.

3 THE WITNESS: I can't imagine he  
4 would, but that's --

5 BY MR. HILLIARD:

6 Q. And why is that hard to imagine that  
7 he would do that?

8 A. I think he would be smarter than  
9 that.

10 MR. HILLIARD: Those are all the  
11 questions I have for you, Mr. Woody. I  
12 appreciate your time.

13 THE WITNESS: Thank you.

14

15 EXAMINATION

16 BY MR. JACOBOVITZ:

17 Q. Okay. I have a few follow-ups.

18 A. Okay.

19 Q. Mr. Woody, did you -- this is in  
20 response to what you were asked by Mr.  
21 Hilliard -- did you tell the investigator about  
22 what you had heard about Juan Alvarez?

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1 A. I don't recall.

2 Q. And you just testified that you  
3 can't imagine Shirah would sell a ping. Is  
4 that correct?

5 A. I can't. That's correct.

6 Q. Now Shirah owns Bail Integrity. Is  
7 that correct?

8 A. He does.

9 Q. And he's 100 percent owner?

10 A. Unless something has changed. He  
11 was.

12 Q. And Alvarez was a recovery agent for  
13 Bail Integrity?

14 A. He was.

15 Q. And whoever sold the ping to the  
16 reporter, you believe was working for Bail  
17 Integrity. Is that correct?

18 A. It said --

19 The article says yes. I have no  
20 reason to doubt the article.

21 Q. Okay. And to your knowledge did  
22 Shirah ever confront Alvarez or anyone else

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1 about who sold the ping?

2 A. I was gone. I don't know. That was  
3 before --

4 That was after I left. I don't have  
5 any idea.

6 MR. JACOBOVITZ: Okay. I have no  
7 further questions.

8

9 EXAMINATION

10 BY MR. HILLIARD:

11 Q. Just one follow-up.

12 So you can't testify under oath you  
13 know who sold the ping, correct?

14 A. Correct.

15 Q. And I assume that also means you  
16 can't --

17 MR. JACOBOVITZ: Objection. Form.

18 MR. HILLIARD: Okay. Let me --

19 MR. JACOBOVITZ: Craig, he's  
20 obviously under oath. You keep asking him  
21 about testifying under oath. He's under oath.  
22 He knows that. But go ahead.



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1 BY MR. HILLIARD:

2 Q. So you can't testify that it was  
3 anyone who was even associated with Bail  
4 Integrity Solutions who sold a ping, correct?

5 MR. JACOBOVITZ: Objection. Form.

6 THE WITNESS: I only know what the  
7 article says.

8 MR. HILLIARD: Thank you. Nothing  
9 further?

10 MR. JACOBOVITZ: 1 minute. Let me  
11 just see if I have anything further.

12 I have nothing further right now.

13 MR. HILLIARD: Thanks for your time.

14 Is the witness going to read and  
15 sign?

16 MR. JACOBOVITZ: You have a right to  
17 read the transcript and sign it in terms of  
18 verifying its accuracy. Do you intend to do  
19 that?

20 THE WITNESS: No, sir.

21 MR. JACOBOVITZ: Okay.

22 MR. HILLIARD: Regular for me.